

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Robert Fischer and Stephanie Lukis,)	
individually and on behalf of all others)	
similarly situated,)	Case No. 1:19-cv-04892
)	
Plaintiffs,)	Honorable Manish S. Shah
)	
v.)	
)	
Instant Checkmate LLC,)	
)	
Defendant.)	

JOINT STATUS REPORT ON SETTLEMENT

Pursuant to the Court’s June 16, 2023 minute order, (Dkt. 256), Plaintiffs Robert Fischer and Stephanie Lukis and Defendant Instant Checkmate LLC (collectively, “the Parties”), by and through their attorneys, submit the below joint status report on the finalization of the Parties’ proposed class action settlement of this matter:

1. The Parties reached a settlement in principle of this action in May 2023, with the assistance of the Hon. Sidney I. Schenkier (Ret.) as mediator. The Parties previously requested that the Court suspend briefing on Defendant’s motion to decertify the Class pending presentment of that settlement for approval, which the Court granted. (Dkt. 254.) The Parties have subsequently been working to finalize the draft of the proposed settlement and—as they indicated they would do in their last status report, (Dkt. 255)—have continued to alert other courts with related litigation pending against Defendant of the plan to move for preliminary approval of the settlement before this Court. The Court ordered the Parties to submit a joint status report or move for preliminary approval of the proposed settlement by July 14, 2023. (Dkt. 256.)

2. Since the Parties’ last status report, they have continued to work diligently on finalizing a full settlement agreement and all supporting documents, including circulating multiple

redlined drafts and conferencing to discuss the same. The Parties have made significant progress, and reasonably expect to have final agreed drafts of all documents out for signature within the next week.

3. In order to allow the Parties to complete the drafting process, obtain signatures to the final settlement, and for Plaintiffs to finalize their preliminary approval and related filings, the Parties respectfully request that the Court enter a similar order to docket entry 256, with a deadline of August 4, 2023, or other similar deadline at the Court's convenience.

Dated: July 14, 2023

Respectfully Submitted,

INSTANT CHECKMATE LLC

By: /s/ Debbie L. Berman (with permission)

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